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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA

10 EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION, *et al.*,

11 Plaintiffs,

12 v.

13 GEORGIA-PACIFIC CORRUGATED
14 LLC,

15 Defendant.
16

Case No. C 07 3944 SBA

**DECLARATION OF MARGARET HART
EDWARDS IN SUPPORT OF
DEFENDANT'S MOTION TO CHANGE
TIME; 30-DAY EXTENSION OF TIME TO
COMPLETE MEDIATION**

Courtroom: 3
Judge: The Hon. Sandra B. Armstrong

17 I, Margaret Hart Edwards, hereby declare:

18 1. I am a shareholder with the law firm of Littler Mendelson, a Professional
19 Corporation, counsel of record for Defendant ("G-P") in the above-captioned matter. I make this
20 declaration based on my own personal knowledge and, if called as a witness, I could and would
21 testify competently thereto.

22 2. On January 8, 2008, Janet Stege's attorney, Kathryn Burkett Dickson,
23 contacted me to inform G-P that Stege would be filing a motion to intervene and that Ms. Dickson
24 would be attending Stege's deposition, then scheduled for the very next day, January 9, 2008. As I
25 had no statement of Stege's claims in intervention and Ms. Dickson refused to allow Stege's
26 deposition to be reopened once Stege's claims in intervention were available, I postponed the Stege
27 deposition.
28

1 3. As G-P had stated in the Joint Case Management Statement, I told Ms.
2 Dickson that G-P intended to oppose any motion to intervene, and that the deposition should be
3 continued until such motion was decided by the Court. The deposition noticed for January 9, 2008,
4 was, therefore, taken off calendar.

5 4. At Stege's request, based on Ms. Dickson's unavailability due to a trial, G-P
6 agreed to stipulate to continue the hearing on Stege's motion to intervene ("Motion") to April 1,
7 2008. The Court granted Stege's request for a continuance by order filed February 19, 2008.

8 5. As of March 18, 2008, when Stege filed her Reply brief in support of her
9 Motion, the parties anticipated that Stege's Motion would be resolved on or around the hearing on
10 April 1, 2008. Thus, the parties had agreed on Stege's deposition for April 7 and 8, 2008 at a pre-
11 mediation teleconference.

12 6. On April 3, 2008, not knowing whether Stege's Motion — the reason that
13 Stege's deposition was originally taken off calendar — would be granted, I proposed to EEOC
14 attorney Linda Ordonio-Dixon that the parties continue Stege's deposition to later in April, as
15 follows:

16 As the court has taken the motion to intervene under submission, and
17 we have no ruling, we believe that it would be premature to proceed
18 with the deposition of Ms. Stege on Monday and Tuesday of next
19 week. I'd like to propose that we try to reschedule the deposition for
20 April 21 and 22, in the hope that we have a ruling by then, one way or
 the other, and we can get the deposition before the mediation on April
 24, 2008. Will those dates work for you? If not, please give me
 alternative dates.

21 The EEOC notified me that it was not possible to conduct the deposition on April 21 and 22, so as
22 to complete the deposition before the mediation.

23 7. On April 8, 2008, I requested that Ms. Ordonio-Dixon agree to set Stege's
24 deposition for April 24 and 25, 2008, and that the parties stipulate to a 30-day extension to complete
25 mediation. (Stege was not yet a party to the action). On April 9, 2008, the Court issued its Order
26 granting Stege's Motion. Also on April 9, Ms. Ordonio-Dixon was informed me that Plaintiffs'
27 were apparently insisting that the mediation go forward without Ms. Stege's deposition, which we
28 had all previously agreed was necessary to a productive mediation. I then informed Ms. Ordonio-

1 Dixon that G-P would file the instant motion today, April 10, 2008, and asked if she would oppose
2 it. I received no reply.

3 I declare under penalty of perjury under the laws of the State of California that the
4 foregoing is true and correct.

5 Executed this 10th day of April, 2008 at Phoenix, Arizona.

6
7 /s/ Margaret Hart Edwards

MARGARET HART EDWARDS

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